

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

DARLENE POOLE

NO. 2:11-CV-00513-PM-KK

VERSUS

JUDGE PATRICIA MINALDI

GORTHON LINES AB, ET AL

MAGISTRATE JUDGE KATHLEEN KAY

**FIRST SUPPLEMENTAL AND
AMENDING PETITION FOR DAMAGES**

NOW INTO COURT, through undersigned counsel, comes DARLENE POOLE, resident of the Parish of Calcasieu, State of Louisiana, who amends and supplements the original Petition for Damages as follows:

I.

To add as defendant, under Paragraph 1, the following:

BLOW SEA SHIPPING LIMITED, a foreign corporation, authorized under the laws of the country of Cyprus, not authorized, yet doing business within the State of Louisiana, who may be served through the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents;

LEMISSOLER SHIPMANAGEMENT, LTD., a foreign corporation, authorized under the laws of the country of Cyprus, not authorized, yet doing business within the State of Louisiana, who may be served through the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents; and

TRANSATLANTIC SERVICES AB, a foreign corporation, authorized under the laws of the country of Sweden, not authorized, yet doing business within the State of Louisiana, who may be served through the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents.

II.

To supplement Paragraph No. 4 to read as follows:

“4.

At all times pertinent hereto, the M/V Alida Gorthon and the forklift in question were owned and/or operated by defendants, GORTHON LINES AB, REDERI AB TRANSATLANTIC, BLOW SEA SHIPPING, LTD., LEMISSOLER SHIPMANAGEMENT, LTD., AND/OR TRANSATLANTIC SERVICES, AB.”

III.

All remaining allegations contained in the original Petition for Damages are hereby re-urged and reiterated, as if copies herein in extension.

IV.

To supplement the prayer to read as follows:

“WHEREFORE, PETITIONER, DARLENE POOLE, PRAYS THAT:

I. Defendants, GORTHON LINES AB, REDERI AB TRANSATLANTIC, the M/V ALIDA GORTHON, BLOW SEA SHIPPING, LTD., LEMISSOLER SHIPMANAGEMENT, LTD., AND/OR TRANSATLANTIC SERVICES, AB.be cited and served with this petition;

II. After the lapse of all delays and due proceeding there be judgment herein in favor of plaintiff, DARLENE POOLE, and against Defendants, GORTHON LINES AB, REDERI AB TRANSATLANTIC, the M/V ALIDA GORTHON, LEMISSOLER SHIPMANAGEMENT, LTD., BLOW SEA SHIPPING, LTD., AND/OR TRANSATLANTIC SERVICES, AB, individually, jointly, and insolido, for such damages as are necessary to fully and fairly compensate plaintiff, together with interest thereon from date of judicial demand, until paid, and for all costs of these proceedings.

III. For full, just, and equitable relief.”

WHEREFORE, DARLENE POOLE, PRAYS THAT this First Supplemental and Amending Petition be filed.

FURTHER PRAYS that GORTHON LINES AB, REDERI AB TRANSATLANTIC, and M/V ALIDA GORTHON be served with a copy of the First Supplemental and Amending Petition for Damages and that the defendants, LEMISSOLER SHIPMANAGEMENT, LTD., BLOW SEA SHIPPING, LTD., AND TRANSATLANTIC SERVICES, AB, be cited and served with a copy of the original Petition for Damages and the First Supplemental and Amending Petition for Damages.

FURTHER PRAYS for all orders and decrees necessary in the premises and for full, general and equitable relief.

Respectfully submitted,

/s/ Michael G. Hodgkins
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Counsel for Darlene Poole

SERVICE INFORMATION:

BLOW SEA SHIPPING, LTD.

Limassoi, Cyprus

Service Via the Hague Convention

on the Service Abroad of Judicial and Extrajudicial Documents

LEMISSOLER SHIPMANAGEMENT, LTD.

Service Via the Hague Convention

on the Service Abroad of Judicial and Extrajudicial Documents

TRANSATLANTIC SERVICES, AB

Heisingborg, Sweden

Service Via the Hague Convention

on the Service Abroad of Judicial and Extrajudicial Documents

CERTIFICATE

I hereby certify that on the 14th day of April, 2011, a copy of the foregoing Supplemental and Amending Petition for Damages was filed electronically with the Clerk of Court using the CM/ECF System. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

/s/ Michael G. Hodgkins
MICHAEL G. HODGKINS